

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

FIRESTAR DIAMOND, INC., *et al.*

Debtors.

Chapter 11

No. 18-10509 (SHL)

(Jointly Administered)

RICHARD LEVIN, Chapter 11 Trustee of
FIRESTAR DIAMOND, INC., FANTASY, INC.,
and OLD AJ, INC. f/k/a A. JAFFE, INC.,

Plaintiff,

v.

NIRAV DEEPAK MODI, MIHIR BHANSALI,
and AJAY GANDHI,

Defendants.

Adv. Proc. No. 19-1102 (SHL)

NOTICE OF FILING OF REDLINED VERSION OF FIRST AMENDED COMPLAINT

1. On March 27, 2019, Chapter 11 Trustee Richard Levin (the “**Trustee**”), plaintiff in the above-captioned adversary proceeding, filed his *Complaint Against Insiders for Breach of Fiduciary Duty, Aiding and Abetting Breach of Fiduciary Duty, Corporate Waste, and Violations of the Racketeering Influenced Corrupt Organizations Act* [Adv. Dkt. 1] (the “**Original Complaint**”).

2. On September 20, 2019, the Trustee filed his *First Amended Complaint Against Insiders for Breach of Fiduciary Duty, Aiding and Abetting Breach of Fiduciary Duty, Corporate Waste, and Violations of the Racketeering Influenced Corrupt Organizations Act* [Adv. Dkt. 28] (the “**First Amended Complaint**”).

3. A redline of the First Amended Complaint against the Original Complaint is attached hereto as **Exhibit A**.

Dated: September 20, 2019,

New York, New York

Respectfully submitted,

JENNER & BLOCK LLP

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